

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SUPPLEMENT MANUFACTURING
PARTNER, INC. d/b/a SMP NUTRA,

Plaintiff,

-against-

WILLIAM CARTWRIGHT,

Defendant.

Case No. 2:23-cv-06585

DECLARATION OF JOSEPH IMPERIO

I, JOSEPH IMPERIO, declare as follow:

1. I am the Chief Executive Officer at Supplement Manufacturing Partner, Inc. (“SMP Nutra” or “Company”). I am over 18 years old and not a party to this lawsuit. I make this declaration based on my personal knowledge of the events described herein. If called as a witness, I am able to testify to the truth of the below statements.
2. Steven Milano, (“Milano”), Will Cartwright (“Cartwright”) and I jointly agreed to form the Company in June 2019.
3. On August 16, 2023, Cartwright and I had a meeting to address the ownership percentages of the Company among us three. At that meeting, we had a discussion about formally transferring the shares Cartwright had been holding for me, and Cartwright admitted that he was “holding shares” for me. He made an audio recording of the meeting and said that he would provide me with a copy, but has not done so.
4. On August 31, 2023, while the ownership dispute remained unresolved, Cartwright came to my house and drove away my car, which was parked in my driveway, as well as my personal belongings inside the car. The car was paid for out of my distributions from the Company, and has been driven exclusively by me. I believe the title of the

car is in both my and Cartwright's names. While Cartwright has the key to the car, he never had my permission to enter my premises and take away the car without notifying me. Therefore, Cartwright trespassed on my premises when engaged in such conduct.

5. On September 1, 2023, Cartwright sent screenshots of privileged communications from Milano's email account with SMP Nutra's outside counsel to me via text messages, telling me that he was cutting off my access to the company's Hubspot to ensure I "cannot steal access" from him, which I never intended to do. Attached as Exhibit A is the true and exact copies of the text messages between me and Cartwright.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 5, 2023

New York, New York



Joseph Imperio (Sep 5, 2023 11:05 EDT)

JOSEPH IMPERIO

Exhibit A



